

**REMARKS**

Claims 1-3, 6, 8-10, 13-16 and 19 were rejected under 35 USC 102(e) as being anticipated by Delean, U.S. Patent 6,512,855. This rejection is respectfully traversed.

Claim 1 recites "applying the calculated characteristic parameter to a second prepared model that has a second model resolution, the second model resolution being higher than the first model resolution." Thus, the image is converted into a higher resolution image. Delean fails to teach or suggest this feature. In fact, Delean fails to teach or suggest converting an image into a higher resolution image.

The Examiner asserts that col. 5, line 59 through col. 6, line 32, and Figs. 1-8a, teach that the second image format "eventually has a higher resolution than the first input image." Applicants respectfully disagree.

Delean actually discloses a system which generates a reduced resolution image by averaging a particular number of adjacent pixels. Delean clearly states that a reduced definition image is formed (col. 5, line 66). There is simply no disclosure which even suggests that a second image with a higher resolution is prepared. Therefore, the features of claim 1 are not taught or suggested by Delean.

Claims 8 and 14 recite substantially the same features as claim 1 and are therefore allowable for the same reasons. The remaining claims are allowable at least due to their respective dependencies. Applicants request that this rejection be withdrawn.

Claims 1-3, 6-10, 13-16, 19 and 20 were rejected under 35 USC 102(b) as being anticipated by Murakami, U.S. Patent 5,057,940. This rejection is respectfully traversed.

Murakami also fails to teach or suggest "applying the calculated characteristic parameter to a second prepared model that has a second model resolution, the second model resolution being higher than the first model resolution." As described in Murakami, section 130 receives three-dimensional model information  $S_{16b}$  and forms face image information  $S_{11b}$  for one frame by

referring to the actual frame coordinate values  $S_{16b}$  (col. 6, lines 1-6). Murakami does not, however, disclose any relation between database 122a and database 122b, and a relation between information  $S_{12a}$  and information  $S_{12b}$ . Thus, Murakami fails to teach or suggest applying the calculated characteristic parameter to a second prepared model that has a resolution which is higher than the resolution of the first model. Thus, Murakami fails to teach or suggest the features of claim 1.

Claims 8 and 14 recite substantially the same features as claim 1 and are therefore allowable for the same reasons. The remaining claims are allowable at least due to their respective dependencies. Applicants request that this rejection be withdrawn.

Claims 4, 5, 11, 12, 17 and 18 were rejected under 35 USC 103(a) as being unpatentable over Delean or Murakami. These claims are allowable at least due to their respective dependencies. Accordingly, Applicants request that this rejection be withdrawn.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 325772025500.

Dated: December 17, 2003

Respectfully submitted,

By Deborah S. Gladstein

Deborah S. Gladstein

Registration No.: 43,636

MORRISON & FOERSTER LLP

1650 Tysons Blvd, Suite 300

McLean, Virginia 22102

(703) 760-7753